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October 26, 2022

The Honorable Denise L. Cote
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: Silver v. Lee Anav Chung White Kim Ruger & Richter LLP, et al.
22 Civ. 1593 (DLC)

Dear Judge Cote:

As counsel for Defendants in the above-referenced matter, I write with the consent of Plaintiff's counsel to request a new date for the parties' in-person status conference, which the Court recently moved to October 28, 2022. I have a prior commitment to represent an employer in collective bargaining negotiations throughout the day on October 28. Mr. Consiglio, who represents the Plaintiff, has advised that he has an all-day conflict on October 28. The parties therefore jointly propose that the status conference be rescheduled for either November 4 or November 18 at a time that pleases the Court. The parties are also amenable to adjournment of the conference until the conclusion of fact discovery, currently scheduled for December 21, if that is the Court's preference.

The parties have not requested any prior adjournments of this conference, and this request does not require amendment of any existing scheduling orders. The parties are currently engaged in scheduling the remaining depositions in the case for dates certain in November and December, consistent with the Court's prior extension of the deadline to complete discovery. In addition, the parties do not have any discovery disputes at this time, and recognize their responsibility to report to the Court promptly if any discovery concerns arise that require the Court's involvement.

*The conference is adjourned
to November 4 at 10:00 a.m.
John P. Keil
10/26/22*

Respectfully submitted,

John P. Keil

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